

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,)
Plaintiff)
V.)
JONATHAN WILLIAM WALL,)
Defendant)

)
Criminal No. SAG-19-CR-0500

MOTION FOR PRODUCTION OF IDENTITIES AND LOCATIONS
OF CONFIDENTIAL INFORMANTS

NOTICE OF CONFERRAL

Defendant has conferred with the Government. The Government does not object to the late filing due to the Motions Hearing, per Covid-19, being reset two months from December 2nd, 2020, to February 9th, 2021. The Government does, however, object to this Motion itself.

NOW COMES the Defendant, Jonathan William Wall, by counsel, and respectfully moves that the Court order the Government disclose the identities and locations of confidential informants for reasons set forth in the accompanying Brief in Support:

WHEREFORE, the Defendant respectfully requests:

1. All confidential informant files;
2. Copy of the agreement between informants and the Government;
3. Names of informants;
4. Their location or contact information;
5. The informant's total criminal history;

6. Any proffer agreements, proffer letters, and/or proffer related writings signed or reviewed by confidential informant(s) who were in any way part of the investigation that produced evidence that is being used to prosecute Mr. Wall; along with description of any and all promises made to them in exchange for their cooperation; any internal memoranda written by law enforcement and/or government attorneys with regard to the confidential informants(s).

Respectfully submitted this 14th day of December, 2020

s/ Jason Flores-Williams, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on this date of December 14, 2020, I electronically filed the within document with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

/s/ Jason Flores-Williams
Jason Flores-Williams